

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JUMAREO QUARTEZ JAMES,
a/k/a REO;,
JAMES RUSSELL WINDY BOY; and
KAYLA RENEE KEYES

INDICTMENT

Case No. _____

Violations: 21 U.S.C. §§ 841(a)(1),
841(b)(1)(C), and 846; and 18 U.S.C. § 2

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone

The Grand Jury Charges:

Beginning in or about 2017 and continuing until the date of this Indictment, in the
District of North Dakota, and elsewhere,

JUMAREO QUARTEZ JAMES, a/k/a REO;
JAMES RUSSELL WINDY BOY; and
KAYLA RENEE KEYES

knowingly and intentionally combined, conspired, confederated, and agreed together and
with others, both known and unknown to the grand jury, to distribute and possess with
intent to distribute a mixture and substance containing a detectable amount of oxycodone,
a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, prescription pills containing a detectable amount of oxycodone, a Schedule II controlled substance, in New Town, North Dakota, on the Fort Berthold Indian Reservation, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of controlled substances;
5. It was further a part of said conspiracy that one or more conspirators traveled between North Dakota and other States to acquire and transport prescription pills containing oxycodone;
6. It was further a part of said conspiracy that the defendants utilized residences and hotels in and about the Fort Berthold Indian Reservation, and elsewhere, to possess, store, conceal, and distribute pills containing a detectable amount of oxycodone; and,

7. It was further a part of said conspiracy that one or more conspirators collected money from other persons to purchase prescription pills containing oxycodone;

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Possession with Intent to Distribute Oxycodone

The Grand Jury Further Charges:

On or about June 19, 2018, in the District of North Dakota,

JUMAREO QUARTEZ JAMES, a/k/a REO,

knowingly and intentionally possessed with intent to distribute approximately 96 pills containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

Distribution of Controlled Substances

The Grand Jury Further Charges:

Beginning in or about 2017 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

JUMAREO QUARTEZ JAMES, a/k/a REO;
JAMES RUSSELL WINDY BOY; and
KAYLA RENEE KEYES,

individually, and by aiding and abetting, knowingly and intentionally distributed prescription pills that were a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

RLV/tmg